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April 22, 2022

Magistrate Judge Barbara C. Moses
Southern District of New York
500 Pearl Street, Room 740
New York, NY 10007

Re: G & G Closed Circuit Events LLC v. Bertolini et al
MLZ File No. 2407793
Case No. 1:21-cv-07351-VSB

Dear Judge Moses:

I, Robert B. Hunter, and my firm are counsel to G & G Closed Circuit Events LLC, Plaintiff with respect to the above referenced matter. Mr. Richner and Ms. Fried are counsel for the defendants.

Pursuant to recent Order of this Court, counsel are directed to meet and confer regarding outstanding discovery issues by April 22, 2022 and advise the Court by today of our progress.

Robert H. Rickner, Esq. and I met and conferred today regarding discovery. I am pleased to report, we had a very productive conversation. As importantly, we worked out all outstanding issues concerning asserted deficiencies in defendants' prior responses to Plaintiff's discovery demands. Mr Rickner served an amended response to Requests for Admissions and promised to supplement forthwith prior responses regarding names of employees present on the night of the Program with whatever limited information exists as to revenues on the night in question. I understand the information is very limited; but fully trust he will provide additional responses in the very near future.

Regarding discovery, we are resolved. I wrote earlier and requested an adjournment of the May 3, 2022 conference re discovery. Respectfully I ask the Court to either cancel or adjourn the conference without date.

We also had productive dialog regarding possible settlement. I request a little more time to allow counsel to come to a mutually satisfactory resolution.

Respectfully submitted

Very truly yours,
M.L. ZAGER, P.C.

/s/ Robert B. Hunter
Robert B. Hunter

cc: Robert Howard Rickner, Esq. via ECF
Shana Fried, Esq. via ECF